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54 Century Lane
Montross, Virginia 22520
January 21, 2002

Secretary
Federal Communications Commission
Portals II, TW-A325
445 Twelfth St. S.W.
Washington, D.C. 20554

IN RE: RM-10354

Dear Ms. Salas:

As the author of the petition that has been published for comment by the Commission as RM-10354, I request that the enclosed article from the December 2001 edition of *CQ* Magazine be included in the Commission's record of this proceeding.

Sincerely yours,

John S. Rippey

abolished, the "A" and "B" class distinction in the current Novice/Intermediate and Full licenses will be removed.

Obtaining the Beginner's License

Study for the Foundation license will be able to be completed over a weekend or even a single day. The training, based on an 8 to 10 hour course conducted by radio amateurs, will focus on supervised on-the-air operation, practical "hands on" instruction on operating procedures, essential regulations, avoiding interference, simple construction practices, basic radio theory, and safety.

In addition, to encourage the practical aspect of amateur radio training, unlicensed trainees in a registered training course may operate a station and contact other UK licensed amateurs when supervised by full license holders.

The concept is basically one of "apprenticeship" overseen by amateurs and/or school teachers utilizing a course textbook. The focus will be on knowing "what to do" and "what not to do" on the air. The RA is also considering relaxing the rules on supervised operation where there is no licensed school teacher.

At the end of the course, a simple 20-question multiple-choice examination will be administered by the instructor or some other "registered body," such as the local ham club. There will be a fee to take the exam, but the cost has not yet been determined. Anyone can take the test; there are no age restrictions. As with all UK ham licenses, there is also an annual fee of £15 (about $23 U.S.), but the license will be free to those under age 21 or 75 years or over. Pilot lessons are already being run to evaluate the syllabus and training material.

The RA expects the new entry-level system to be operational in January 2002. The RSGB will be handling much of the routine administration of the training and examination process. At the end of the course the examinee applies to the RA for the license, enclosing a copy of his or her "Foundation License Training Course Completion Slip." All UK ham operators are required to keep a log of all transmissions, except those being made while operating mobile.

The Foundation license started out as a 25 watt VHF/UHF class using only commercially-made equipment. However, the RSGB wanted a way for trainees to be able to operate HF and assemble home-built "QRP kits," and this has been approved by the RA. The kit must be commercially available and not require test equipment or extensive electronic construction practices to be completed.

The use of home-built transmitters (that is, equipment constructed by the amateur without using commercially produced kits) will not be allowed under the Foundation license. The reason for this is that greater technical knowledge is required to properly construct home-built equipment than the Foundation course would provide, and there is a risk that the equipment may cause interference to other radio users.

The Foundation license is designed to compete with internet chat that has no exams and no restrictions at basically "zero cost."

HF Operation with Essentially No Code

Realizing that one of the greater interests in ham radio is the ability to contact amateurs in other countries, the RSGB and RA wanted to find a way for beginners to be able to operate HF voice without learning the code. The International Radio Regulations require that to operate on the HF frequencies an amateur operator must "... prove that he is able to send correctly by hand and to receive correctly by ear, texts in Morse code signals." There is no speed requirement, nor do the international rules specify how this proficiency must be demonstrated.

The RA and RSGB have now agreed that this requirement will consist of a "simple assessment" whereby the examinee will be permitted to use crib sheets to encode messages into Morse. For example, one of the 20 examination questions might be: "What is the letter 'A' in Morse code?" The applicant would look at the chart of alpha/numeric characters and corresponding dot-dash sequences and write down the text—the single letter "A" as a dot and a dash—and then send it. The same would work in reverse when decoding a series of dots and dashes. You would hear and write down the dot-dash sequence and then, using the look-up crib sheet, translate them into letters. This is to comply with current international amateur HF access regulations until after WRC- 2003, when it is assumed that the Morse testing requirement will be removed.

This means that anyone with absolutely no knowledge of Morse code would easily be able to pass the telegraphy "assessment." This Morse code proficiency "test" is not just a proposal. It is exactly how the United Kingdom will be administering code exams to Foundation Class applicants.

Impact on the United States?

Will the UK's new approach to amateur licensing have any effect here in the United States? It is doubtful, at least for the near future. The FCC, having just restructured the amateur licensing system here, is not likely to revisit anything to do with licensing for several years, and certainly not before 2003's World Radiocommunication Conference and any changes that come out of that. However, the FCC will no doubt be watching to see how well it works.

73, Fred, W5YI

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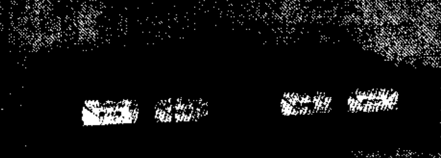

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[illegible]	25	30	3¾ x 7 x 9⅝	5.0

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MODEL	CONT. (Amps)	ICS	SIZE (inches)	Wt.(lbs.)
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[illegible]	25	30	3½ x 19 x 9⅝	11.0

WITH SEPARATE VOLT & AMP METERS

MODEL	CONT. (Amps)	ICS	SIZE (inches)	Wt.(lbs.)
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MOTOROLA RADIUS & GM 300	SS-18RA
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VERTEX — FTL-1011, FT-1011, FT-2011, FT-7011	SS-10V, SS-12V, SS-18V

CIRCLE 134 ON READER SERVICE CARD

youngsters in the 9- to 11-year-old age bracket, the new license class is available to anyone. It essentially yields 10 watt all mode, all band operation between 135.7 kHz and 440 MHz—except 10 meters (see Table II).

The Agency and the RSGB hope that by introducing this new license level amateur radio will become more attractive and accessible to both young and old, and that by taking this first step onto the licensing ladder, Foundation licensees will be motivated to undertake a process of self-training to acquire higher license privileges.

The absence of 10 meters is intended to discourage CB operators from operating with increased power in the amateur 10 meter band. Foundation license equipment is required to be commercially manufactured transceivers or kits which do not provide access to 10 meters. If CBers want long-distance communication privileges, they must be trained for the Foundation license by other radio amateurs.

At present, the UK Radio Amateur Exam (RAE) program is administered by the City & Guilds Institute, a London-based vocational testing operation. The RAE is held twice a year and is a two-part multiple-choice exam that tests electronic theory, license conditions, interference, and operating procedures. The Novice RAE is held four times a year at City & Guilds exam centers.

Future plans are, however, for the RSGB and ham radio clubs to assume the amateur radio training and testing function. Thought is being given to using "new examination technology" (otherwise known as computers), with each candidate being administered a unique examination. Also being considered is "e-licensing" (or electronic authorization).

Since "G" prefix callsigns have run out in England, amateur radio licensees are now issued callsigns beginning with the letter "M"; Novices get "2E" prefix callsigns. (Scotland ham prefixes are MM and 2M for Novices; Wales MW and 2W; Northern Ireland MI and 2I; Isle of Man MD and 2D; Jersey MJ and 2J; and Guernsey and other possessions MU and 2U.) UK Foundation Class callsigns will come from the "M2" prefix series. (A Scottish Foundation license would have an MM2 prefix.) You will even be permitted to select your own suffix if it is available, such as M2JIM.

The UK's New "Foundation" License

The new amateur radio restructuring was formally announced in a joint presentation by the RSGB and the UK's Radiocommunications Agency at the Leicester Amateur Radio Show and Convention held September 21 and 22, 2001 in Leicestershire, England.

Commenting on the new Foundation license, Martin Cain, Head of the Radiocommunications Agency's Specialist Sectors Unit said, "There has long been a need to stimulate further interest in amateur radio in the UK. My colleagues and I firmly believe that the Foundation license, coupled with the support of existing radio amateurs, will go a substantial way to achieving this aim."

Don Beattie, G3BJ, president of the RSGB, warmly welcomed agreement on the new Foundation license. "We now have a more accessible entry point for those who want to become radio amateurs," he said. "Hopefully many will go on to grow in technical skill and competence through qualifying at the more advanced levels of licensing."

He asked all UK amateurs " . . . to help make the new Foundation license the success it deserves to be." The new UK ham radio licensing structure will be the final change prior to the World Radiocommunication Conference in 2003. The Foundation license will be introduced at the beginning of 2002. The RA said that a revised integrated structure of qualifications and examinations for the various licenses is planned to be implemented on January 1, 2004.

It is widely expected that WRC2003 will remove the Morse requirement. If it is

Washington Readout

Regulatory News In The World Of Amateur Radio

BY FREDERICK O. MAIA, W5YI

United Kingdom Restructures its Amateur Radio Licensing

New Foundation License Basically Ends Morse Testing for Beginning HF Operation

"The aim of the Foundation License is to facilitate a simple entry into Amateur Radio as a hobby where you will be able to make friends from all walks of life. We hope that as experience and confidence increase, Foundation licensees will progress up the Amateur Radio ladder to obtain a more advanced Amateur license, with all its attendant privileges."

. . . RSGB statement

On September 21, the UK's Radio Society of Great Britain and its Radiocommunications Agency jointly announced a series of changes to amateur radio licensing designed to make amateur radio more attractive to beginners. The RSGB is the national amateur radio society in Great Britain; the RA its government telecommunications regulatory agency.

The RSGB and RA, which had been working on restructuring their Amateur Service for some time, de-emphasize Morse code at the beginning level. In fact, they basically eliminate it in the new Foundation license—even for HF operation!

The restructuring includes lowering the Morse code speed requirement to 5 words per minute for full licensees, combining some license categories, allowing trainees to operate while supervised before passing an examination, and the introduction of a new Foundation Class license for newcomers. The changes had been widely rumored for months, but there were some surprises.

Summary of the New UK Ham Radio Lineup

Under the old rules there were three license classes in the United Kingdom. The "Full" license had two versions—Code and No-code. The Class "A" (all band) Full required a 12 wpm Morse exam, while the Class "B" Full (VHF and above) had no code requirement. Both permitted 400 watts output power. Their Class A/B level (with a 5 wpm code proficiency requirement) yielded all band privileges at reduced (100 watt) power output. The 10 watt Novice Class also had two variations—(all band) 5 wpm code and (VHF and above) no code (see Table I). There are no CW-only segments in Great Britain, and the RA says it has no plans to set aside some parts of HF for exclusive Morse operation.

Earlier this year the European Conference of Postal and Telecommunications Administrations (CEPT) recommended that the Morse requirement for their Class 1 license (equivalent to a UK Full Class A) be reduced from 12 to 5 wpm. CEPT is a federation of telecom agencies across Europe. This has provided the Agency with an opportunity to review the amateur licensing structure.

In line with the CEPT recommendation, effective October 1, 2001 the UK Full Class "A" and "A/B" was combined into the 400 watt Full Class "A" license and the Morse code testing requirement was reduced to 5 wpm. Class A/B license holders are being offered the choice of either retaining their existing M5 callsign or change to an MØ prefix.

The current 400 W Class B does not change. It still will authorize 400 watt operation on all bands 6 meters and higher. The current 10 watt Novice (all band) "A" and "B" (VHF and above) class has been renamed the Intermediate Class and output power to the antenna has been increased to 50 watts.

The big news, however, is the establishment of a new beginning "Foundation" Class level. Although primarily aimed at

Previous License Class	New License Class
	Full
Class A – 400 W	A – 400 W all bands, 5 wpm Morse test
Class A/B – 100 W	A – 400 W all bands, 5 wpm Morse test
Class B – 400 W VHF	B – 400 W VHF and above (effective October 2001)
	Intermediate
Novice A – 10 W	A – 50 W all bands, 5 wpm Morse test
Novice B – 10 W VHF	B – 50 W VHF and above (effective October 2001)
	Foundation
	10 W most bands from 135.7 kHz to 440 MHz, Morse assessment (effective January 2002*)

**Anticipated implementation date.*

Table I– Summary of the new UK license classes.

UK Foundation Class License		
Frequency Band	**Power**	**Mode**
135.7–137.8 kHz	1 W erp	
1810–2000 kHz	10 W output	
3.5–3.8 MHz	10 W output	
7.0–7.1 MHz	10 W output	
10.10–10.15 MHz	10 W output	(All bands)
14.000–14.35 MHz	10 W output	Morse
18.068–18.168 MHz	10 W output	Telephony
21.00–21.45 MHz	10 W output	(AM/FM/SSB)
24.89–24.99 MHz	10 W output	RTTY
50–52 MHz	10 W output	Data
70–70.5 MHz	10 W output	Facsimile
144–146 MHz	10 W erp	SSTV
430–432 MHz	10 W output	(FSTV –
432–440 MHz	10 W erp	above 50 MHz)

Table II– Frequency, power, and mode privileges accorded to the United Kingdom's new Foundation Class license.

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